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9 **BEFORE THE**
BOARD OF REGISTERED NURSING
10 **DEPARTMENT OF CONSUMER AFFAIRS**
11 **STATE OF CALIFORNIA**

12 In the Matter of the Accusation Against:

Case No. *2013-642*

13 **STEPHANIE ANN STEVENS**
14 **156 Kings Cutoff Road**
Arcadia, LA 71001

A C C U S A T I O N

15 **Registered Nurse License No. 737200**

16 Respondent.

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18
19 Complainant alleges:

20 **PARTIES**

21 1. Louise R. Bailey, M.Ed., RN (Complainant) brings this Accusation solely in her
22 official capacity as the Executive Officer of the Board of Registered Nursing, Department of
23 Consumer Affairs.

24 2. On or about September 24, 2008, the Board of Registered Nursing issued Registered
25 Nurse License Number 737200 to Stephanie Ann Stevens (Respondent). The Registered Nurse
26 License expired on April 30, 2012, and has not been renewed.

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JURISDICTION

3. This Accusation is brought before the Board of Registered Nursing (Board), Department of Consumer Affairs, under the authority of the following laws. All section references are to the Business and Professions Code (Code) unless otherwise indicated.

4. Section 2750 of the Code provides, in pertinent part, that the Board may discipline any licensee, including a licensee holding a temporary or an inactive license, for any reason provided in Article 3 (commencing with section 2750) of the Nursing Practice Act.

5. Section 2764 of the Code provides, in pertinent part, that the expiration of a license shall not deprive the Board of jurisdiction to proceed with a disciplinary proceeding against the licensee or to render a decision imposing discipline on the license. Under section 2811, subdivision (b) of the Code, the Board may renew an expired license at any time within eight years after the expiration.

STATUTORY PROVISIONS

6. Section 2761 of the Code states:

The board may take disciplinary action against a certified or licensed nurse or deny an application for a certificate or license for any of the following:

(a) Unprofessional conduct, which includes, but is not limited to, the following:

(4) Denial of licensure, revocation, suspension, restriction, or any other disciplinary action against a health care professional license or certificate by another state or territory of the United States, by any other government agency, or by another California health care professional licensing board. A certified copy of the decision or judgment shall be conclusive evidence of that action.

COSTS

7. Section 125.3 of the Code provides, in pertinent part, that the Board may request the administrative law judge to direct a licentiate found to have committed a violation or violations of the licensing act to pay a sum not to exceed the reasonable costs of the investigation and enforcement of the case, with failure of the licentiate to comply subjecting the license to not being

1 renewed or reinstated. If a case settles, recovery of investigation and enforcement costs may be
2 included in a stipulated settlement.

3 **CAUSE FOR DISCIPLINE**

4 **(Out of State Discipline Against Respondent's Nursing License)**

5 8. Respondent has subjected her license to disciplinary action under section 2761,
6 subdivision (a)(4) of the Code in that her registered nurse license was disciplined by the
7 Louisiana State Board of Nursing. The circumstances are as follows:

8 9. Respondent was licensed to practice as a registered nurse in Louisiana on June 29,
9 2000. *In the Matter of Stephanie Ann Stevens*, the Louisiana State Board of Nursing (Louisiana
10 Board) alleged in its Findings of Facts that on multiple occasions, from February to May 2011,
11 while Respondent was employed at two different Louisiana hospitals, she removed controlled
12 substances at a rate much higher than the standard deviation, she failed to account for the
13 administration of controlled substances, she failed to account for the wastage of remaining
14 medications, and her behavior exhibited the symptoms of being under the influence of a
15 controlled substance while at work.

16 10. As a result of the allegations, Respondent was presented with a Consent Agreement
17 by the Louisiana Board. In the agreement, Respondent admitted to the Louisiana Board's
18 Findings of Facts and agreed that there was sufficient evidence upon which to predicate a finding
19 of violations of the provisions of Louisiana Revised Statutes 37:971. Respondent agreed that the
20 Louisiana Board may treat the allegations of fact and law as true, and based thereon, the
21 Louisiana Board found the allegations to be true.

22 11. On November 15, 2011, the Louisiana Board adopted the Consent Agreement.
23 Respondent's registered nurse license was ordered suspended for a period of three years. The
24 suspension was stayed and Respondent was placed on probation for a minimum of three years on
25 various terms and conditions to include requirements that she submit to psychiatric,
26 psychological, and substance abuse evaluations, abstain from all mood altering, addictive or
27 dependency-inducing substances, including alcohol and over-the-counter medications, and submit
28 to random drug screens.

12. On January 9, 2012, during a comprehensive outpatient evaluation at an addiction recovery center, Respondent indicated that she had consumed alcohol after entering into the Consent Agreement. A urine sample submitted at the evaluation tested positive for EtG and EtS. Respondent's PEth levels indicated a significant level of alcohol consumption. The results of the evaluation and drug screen were submitted to the Louisiana Board. As a result of Respondent's failure to abide by the terms of her Consent Agreement, the Louisiana Board suspended Respondent's registered nurse license effective February 14, 2012..

DISCIPLINARY CONSIDERATIONS

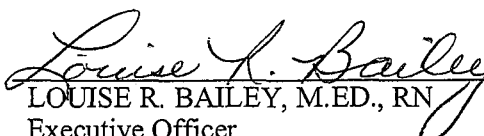
13. On or about March 1, 2012, the Arkansas State Board of Nursing ordered that the voluntary surrender of Respondent's nursing license be accepted. Respondent was permitted to petition for reinstatement of her license after one (1) year.

PRAYER

WHEREFORE, Complainant requests that a hearing be held on the matters herein alleged, and that following the hearing, the Board of Registered Nursing issue a decision:

1. Revoking or suspending Registered Nurse License Number 737200, issued to Stephanie Ann Stevens;
2. Ordering Stephanie Ann Stevens to pay the Board of Registered Nursing the reasonable costs of the investigation and enforcement of this case, pursuant to Business and Professions Code section 125.3;
3. Taking such other and further action as deemed necessary and proper.

DATED: FEBRUARY 20, 2013


LOUISE R. BAILEY, M.ED., RN
Executive Officer
Board of Registered Nursing
Department of Consumer Affairs
State of California
Complainant

SD2012704456